## THE STATE OF NEW HAMPSHIRE

ROCKINGHAM, SS.

JULY TERM, 2008

AMM JUL I H

SUPERIOR COURT

07-S-1028-1031, 2886 08-S-580-583

State of New Hampshire

V.

## John Brooks

## JOINT MOTION TO REVISE JURY INSTRUCTION DEADLINE

Defendant John A. Brooks and the State of New Hampshire jointly request that the Court extend the deadline by which the State and the defendant must submit proposed jury instructions for the guilt and sentencing phases of the trial, from July 14, 2008 until July 28, 2008. The parties submit that other trial preparation obligations have necessitated the extension of time for the submission of the jury instructions.

Respectfully submitted,

JOHN A. BROOKS

By his attorneys

Dated: July 14, 2008

MARTIN F. MURPHY FOLEY HOAG LLP

155 Seaport Boulevard Boston, MA 02210-2600

(617) 832-1000

CHRISTOPHER H.M. CARTER, ESQ. HINCKLEY, ALLEN & SNYDER LLP 11 South Main Street, Suite 400 Concord, NH 03301-4810 Tel: (603) 225-4334

DAVID I. BRUCK, ESQ. WASHINGTON AND LEE UNIVERSITY SCHOOL OF LAW 220 Sydney Lewis Hall Lexington, VA 24450

THOMAS M. HOOPES KELLY, LIBBY & HOOPES, P.C. 175 Federal Street Boston, MA 02110 (617) 338-9300

MONICA FOSTER, ESQ. FOSTER & LONG-SHARP 1455 N. Pennsylvania Street Indianapolis, IN 46202

THE STATE OF NEW HAMPSHIRE

By its attorneys,

Kelly A. Ayotte

Attorney General

Karen E. Huntress

Assistant Attorney General

Criminal Justice Bureau

33 Capitol Street

Concord, NH 03301

(603) 271-3671

July 14, 2008